



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

April 21, 2016

**BY ECF**

The Honorable William H. Pauley, III  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. James Capers et al.,  
15 Cr. 607 (WHP)**

Dear Judge Pauley:

As per the Court's order at the last conference in the above-captioned case, the Government respectfully writes to inform the Court of an additional discovery production that will be sent to the Discovery Coordinator this week. The production consists of a small number of documents and videos related to two acts of violence perpetrated against one of the defendants in the above-captioned case, which are being produced pursuant to Federal Rule of Criminal Procedure 16.

The production also consists of a large volume of social media search warrant returns, recorded jail calls, and cellphone search warrant returns related to individuals associated with Taylor Avenue (the rival gang), many of whom are charged in *United States v. Ortiz et al.*, 15 Cr. 608 (KPF), which defense counsel requested for the first time last week. The Government has not previously provided these materials in this case, as they are not required to be disclosed pursuant to Rule 16 or any of the Government's other disclosure obligations. Nevertheless, the Government is making this production as a courtesy to defense counsel.

Respectfully submitted,

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cc: all counsel (by ECF)